

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

GENOVEVA MORALES, et al.,	§	
	§	
Plaintiffs	§	
	§	
VS.	§	CIVIL ACTION NO. 2:70-cv-00014 OLG
	§	
	§	
E.P. SHANNON, et al.	§	
	§	
Defendants	§	

EXHIBIT C
TO OCTOBER 26, 2012 CONSENT ORDER (DOCKET NO. 204)

The following terms modify and supplement the October 26, 2012 Consent Order (Dkt. No. 204):

1. The October 26, 2012 Consent Order (Dkt. No. 204) is extended for an additional year. Therefore, Section XVI “Final Termination of Case” subsection B. “Dismissal of Lawsuit” of the October 26, 2012 Consent Order (Dkt. No. 204) is modified as follows: On or after April 26, 2016, the District may file a Motion to Dismiss this lawsuit. Plaintiffs may file any exceptions or objections they may have based upon the District’s alleged non-compliance with the Consent Order and attachments and may conduct reasonable discovery. Unless the Court finds material non-compliance with the terms of the Consent Order by the District after the filing of any such objections by the Plaintiffs, this case will be considered dismissed in its entirety by Order of this Court to follow on a date no earlier than October 26, 2016.

2. The District shall hire a consultant to oversee the District’s compliance with the Consent Order in all areas contained in the Consent Order, including those contained in Exhibit A of the Order. The consultant will have experience and expertise in school desegregation cases

and in each areas identified in the Consent Order. The consultant will assist the District in developing a plan to ensure compliance with each provision of the Consent Order. The consultant will present bi-annual reports to the Board and the public on the District's compliance and non-compliance with each obligation under the Consent Order. The bi-annual reports will be due in the Spring (no later than April 15) and in the Fall (no later than October 15). The reports will also include the District's plan to comply over the remainder of the term of the Consent Order. The consultant's reports will be produced to Plaintiffs' attorneys at least 5 business days before the reports are presented to the Board and the public. This obligation does not relieve the District of its other obligations under the Consent Order, such as annual reporting requirements set out in Section XIII of the Consent Order.

3. The District agrees to consider consultants (per item No. 2) recommended by Plaintiffs and shall not hire any consultant reasonably objected to by Plaintiffs.

4. The consultant hired pursuant to item No. 2 above shall be hired to begin by July 2014 and shall work for one full year. The deadline for initial implementation of the consultant's compliance plan is August 15, 2014. A copy of the consultant's initial plan will be made available to Plaintiffs when it is completed. After the consultant's one-year term, both parties will assess whether the District has been implementing the plan and whether substantial compliance is evidenced after one full year of actual work performed by the consultant. If the parties do not agree concerning substantial compliance with the Consent Order, the District will continue the employment of the consultant for another year, provided the District has adequate funding available to pay the consultant for an extra year term.

5. The District agrees to hire a Bilingual Director to begin work no later than the start of the 2014-15 school year.

6. The District further agrees to pay Plaintiffs' counsel, MALDEF, a sum agreed upon by the parties in a separate agreement for reasonable costs and attorneys' fees to date and shall pay said sum on or before May 30, 2014.